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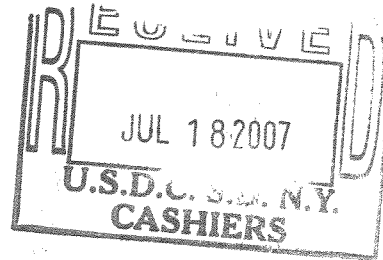
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ZIM INTEGRATED SHIPPING SERVICES, LTD.,
KORON MARITIME, INC., SETH SHIPPING, LTD.,

Plaintiffs,

- against -

PRODUIMPORT EMPRESA IMPORTADORA Y
COMERCIALIZADORA, PAR INTERCONTINENTAL
(HK) LTD., NINGBO ETDZ HOLDINGS LTD., HAINAN
ZHEJIN FOREIGN TRADE CO., FENGHUA
SUNNYSTAR INT'L TRADE CO. LTD., GUANGZHOU
TUBOMART TRADING CO. LTD, Z&H UNITED
MANUFACTURE LIMITED, TRICAPE
INTERNATIONAL CO. LTD., INTERNATIONAL
TRADING CORPORATION, MIKACHI IMPEX CO.
LTD., TAIZHOU ZHENUOER SHOES CO. LTD,
WENZHOU HUADA PLASTIC PACKING PLANT,
WUHU ZHONGRUI IMP.AND EXP.CO. LTD., NEW
ZHONG YUAN CERAMICS IMPORT AND EXPORT
CO., LTD., SHANGHAI R AND P LOGISTICS LTD.,
ZHEJIANG SUNGO ELECTRIC APPLIANCE CO. LTD.,
HOWARD BERGER CO. INC , BROADWAY TRADING
COMPANY, HAINAN YOUMING TRADING CO. LTD,
ETERNITY INT'L FREIGHT FORWARDER(HK) LTD.,
ZHEJIANG SHUANGHUAN PLASTIC VALVE
ENTERPRISE.LTD., JIANGSU EVER-OK
INTERNATIONAL FORWARDING (NINGBO), CHINA
CONTAINER LINE LTD., RS LOGISTICS LIMITED,
MCL MULTI CONTAINER LINE, DAIWA MOTOR
PARTS CORPORATION, HI-MAS INDUSTRIAL CO.
LTD., CAPEHART LIMITED., BRAKE PARTS



07 CIV 6500
Case No.

VERIFIED COMPLAINT

INTERNATIONAL INC., NORDYNE INTERNATIONAL,
 GUANGDONG WINTO CERAMICS CO. LTD., WANG
 DAI HAO TRADING CO. LTD., ZHUZHOU XIANGRUI
 PLASTIC BUILDING MATERIAL CO. LTD.,
 SHENZHEN JIAXINDA IMPORT EXPORT CO. LTD.,
 PENAVICO SHENZHEN LOGISTICS LTD., SHENZHEN
 T-STAR IMPORT & EXPORT CO. LTD., ROYAL RICH
 (CHINA) LTD., TANGSHAN LUQI ECONOMIC TRADE
 CO. LTD., FOSHAN JUNJING INDUSTRIAL CO. LTD.,
 FOSHAN SHUNDE GALANZ MICROWAVE OVEN
 ELECTRICAL APPLIANCE LTD., CHAOZHOU
 FENGXI PORCELAIN INDUSTRIAL TRADE IMP&EXP,
 WORLDWIDE TECHNICAL INC., GIBSON OVERSEAS
 INC., MILLI INTERNATIONAL CO. LTD., FOSHAN
 HAIYIJIA IMP & EXP CO. LTD., BRUNO SCHEIDT
 INC., GRANDTECH FUNITURE CO. LTD., BEIJING
 KANG JIE KONG GUANGZHOU, FOSHAN CITY
 YELONG ECONOMY TRADE CO. LTD.,
 ASSOCIAZIONE LOGISTICA SPEDIZIONIERI S.R.L.,
 RICAL OCEAN FORWARDING CO. LTD., AGI
 LOGISTICS (HONG KONG) LTD., NEXES UNIVERSAL
 LTD., TWIN-STAR ASIA LTD., GD MD AIR-
 CONDITIONING EQUIPMENT CO. LTD., RS
 LOGISTICS LIMITED, BIRKART GLOBISTICS LTD., J
 & S EXPRESS (H.K.) LTD., SCHENKER
 INTERNATIONAL (H.K.) LTD., BIRKART GLOBISTICS
 LTD., GREE ELECTRIC APPLIANCES INC.OF
 ZHUHAI, PLACETECH CO. LTD., TWIN-STAR ASIA
 LTD., GLOBE EXPRESS SERVICES LTD., FAME
 RESPECT LTD, PT BEA SARI JELITA SOAP AND
 DETERGENT INDUSTRY, PT. SPARTA
 INTERNATIONAL LINE, PT. KEDAWUNG SUBUR, PT.
 MEDIA AKSARA GLOBALINDO, PT. NATRACO
 SPICES INDONESIA ON BEHALF OFCURACAO
 TRADING COMPANY GMBH, TROPICAL
 CONSOLIDATED CORPORATION, GARDA IMPORT
 EXPORT, CORPORACION AMADEA S.A., RAMON
 CORRIPIO & SUCS.C X A., S. NARINE, UNIVERSAL
 DE REPUESTOS C.PORA, PETER P.IMPORTS &
 EXPORTS, TAXTRAN LIMITED, CASH PLUS FOODS
 LIMITED, INTERAMERICAN SOURCING CO. INC.,
 CARIBBEAN RETAIL VENTURES INC., GUO SHENG,
 PESHAN VASTGOEB N.V., YIN RONG TRADING
 COMPANY N.V., SHAZAM ENTERPRISES &

INVESTMENTS LTD., U.S. SHIPPING INC. SD,
CHINA CONTAINER LINE LTD (NEW YORK), OCEAN
KNIGHT SHIPPING INC., AIT WORLDWIDE
LOGISTICS INC., IMPORTADORA BICIMOTO
LTDA.C.A., PLASTICOS HERCULES C.A.,
AUTOMOTRIZ DISTRIBUCION AUTODIST, COMFORT
ENGINEERING, ARUBA BLUE VILLAGE, PACIFICO
SUPERMARKET, PRIMEX VINYL CONCEPTS INC.,
BANCO BILBAO VIZCAYA ARGENTARIA PR, PAN
AMERICAN ELETRIC DO BRASIL LTDA RUA, KUN
SUN CHANG(CAPITAL FACTORY), CONSOLCARGO
LTDA, ARTEX S.A., DEONARINE SUGRIM,
AMARNAUTH SOOKRAM, DEONARINE SUGRIM,
JAMIL INTERNATIONAL LIMITED, KARST
AGENCIES, ELKAY DISTRIBUTORS LTD., PRECISION
TRADING CORP., MADERAS ALFA, INC., ROOMS TO
GO, INTERNATIONAL TILES CARPETS AND RUGS
LTD., AMERICAN ROLAND FOOD CORP., SING DA
RESTAURANT, CADEL TRADING, SANTRAX
MARKETING LIMITED, EXPEDITORS
INTERNATIONAL, USA SHOP C.A., INTERGLOBO
NORTH AMERICA INC., CONAIR CORPORATION, L G
SOURCING INC., ELECTROLUX HOME PRODUCTS,
ELECTROLUX MAJOR APPLIANCES, TRANSMART
LOGISTICS INC., ALLIANCE INTERNATIONAL,
SAVANT INTERNATIONAL LOGISTICS LTD.,
SCHENKER INC., ALLIANCE INTERNATIONAL,
ELECTROLUX MAJOR APPLIANCES, GLOBE
EXPRESS SERVICES, SEARS ROEBUCK AND CO.,
P.C.P. S.A., GRACEKENNEDY LIMITED, PARSRAM
DISCOUNT STORE, BHOJWANI GENERAL
IMPORTERS, ELECTRO REFRI S.A/CASAMI, ALI'S
HARDWAREMATERIALS&SERVICES LTD.,
EUROMODA INTERNATIONAL CORP., J. PICA AND
CIA. INC., HADCO LTD., RICAL LOGISTICS,
AIRGATE INT'L CORP (NEW YORK), UPS SUPPLY
CHAIN SOLUTIONS INC., MENLO WORLDWIDE,
KAYBEE EXIM PTE LTD., C.K.M.C POR A, GAZEBO
(H.K.) LIMITEDAND COMPANIES XYZ 1-30,

Defendants.

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Plaintiffs ZIM INTEGRATED SHIPPING SERVICES, LTD. (“Zim”), KORON MARITIME, INC. (“Koron”), and SETH SHIPPING, LTD. (“Seth”) by their attorneys, DeOrchis, Wiener & Partners, LLP, as and for their Complaint against Defendants PRODUIMPORT EMPRESA IMPORTADORA Y COMERCIALIZADORA, PAR INTERCONTINENTAL (HK) LTD., NINGBO ETDZ HOLDINGS LTD., HAINAN ZHEJIN FOREIGN TRADE CO., FENGHUA SUNNYSTAR INT'L TRADE CO. LTD., GUANGZHOU TUBOMART TRADING CO. LTD, Z&H UNITED MANUFACTURE LIMITED, TRICAPE INTERNATIONAL CO. LTD., INTERNATIONAL TRADING CORPORATION, MIKACHI IMPEX CO. LTD., TAIZHOU ZHENUOER SHOES CO. LTD, WENZHOU HUADA PLASTIC PACKING PLANT, WUHU ZHONGRUI IMP.AND EXP.CO. LTD., NEW ZHONG YUAN CERAMICS IMPORT AND EXPORT CO., LTD., SHANGHAI R AND P LOGISTICS LTD., ZHEJIANG SUNGO ELECTRIC APPLIANCE CO. LTD., HOWARD BERGER CO. INC , BROADWAY TRADING COMPANY, HAINAN YOUMING TRADING CO. LTD, ETERNITY INT'L FREIGHT FORWARDER(HK) LTD., ZHEJIANG SHUANGHUAN PLASTIC VALVE ENTERPRISE.LTD., JIANGSU EVER-OK INTERNATIONAL FORWARDING (NINGBO), CHINA CONTAINER LINE LTD., RS LOGISTICS LIMITED, MCL MULTI CONTAINER LINE, DAIWA MOTOR PARTS CORPORATION, HI-MAS INDUSTRIAL CO. LTD., CAPEHART LIMITED., BRAKE PARTS INTERNATIONAL INC., NORDYNE INTERNATIONAL, GUANGDONG WINTO CERAMICS CO. LTD., WANG DAI HAO TRADING CO. LTD., ZHUZHOU XIANGRUI PLASTIC BUILDING MATERIAL CO. LTD., SHENZHEN JIAXINDA IMPORT EXPORT CO. LTD., PENAVICO SHENZHEN LOGISTICS LTD., SHENZHEN T-STAR IMPORT & EXPORT CO. LTD., ROYAL RICH (CHINA) LTD., TANGSHAN LUQI ECONOMIC TRADE CO. LTD., FOSHAN JUNJING INDUSTRIAL CO. LTD., FOSHAN SHUNDE GALANZ MICROWAVE OVEN ELECTRICAL APPLIANCE LTD., CHAOZHOU FENGXI PORCELAIN

INDUSTRIAL TRADE IMP&EXP, WORLDWIDE TECHNICAL INC., GIBSON OVERSEAS INC., MILLI INTERNATIONAL CO. LTD., FOSHAN HAIYIJIA IMP & EXP CO. LTD., BRUNO SCHEIDT INC., GRANDTECH FUNITURE CO. LTD., BEIJING KANG JIE KONG GUANGZHOU, FOSHAN CITY YELONG ECONOMY TRADE CO. LTD., ASSOCIAZIONE LOGISTICA SPEDIZIONIERI S.R.L., RICAL OCEAN FORWARDING CO. LTD., AGI LOGISTICS (HONG KONG) LTD., NEXES UNIVERSAL LTD., TWIN-STAR ASIA LTD., GD MD AIR-CONDITIONING EQUIPMENT CO. LTD., RS LOGISTICS LIMITED, BIRKART GLOBISTICS LTD., J & S EXPRESS (H.K.) LTD., SCHENKER INTERNATIONAL (H.K.) LTD., BIRKART GLOBISTICS LTD., GREE ELECTRIC APPLIANCES INC.OF ZHUHAI, PLACETECH CO. LTD., TWIN-STAR ASIA LTD., GLOBE EXPRESS SERVICES LTD., FAME RESPECT LTD, PT BEA SARI JELITA SOAP AND DETERGENT INDUSTRY, PT. SPARTA INTERNATIONAL LINE, PT. KEDAWUNG SUBUR, PT. MEDIA AKSARA GLOBALINDO, PT. NATRACO SPICES INDONESIA ON BEHALF OFCURACAO TRADING COMPANY GMBH, TROPICAL CONSOLIDATED CORPORATION, GARDA IMPORT EXPORT, CORPORACION AMADEA S.A., RAMON CORRIPIO & SUCS.C X A., S. NARINE, UNIVERSAL DE REPUESTOS C.PORA, PETER P.IMPORTS & EXPORTS, TAXTRAN LIMITED, CASH PLUS FOODS LIMITED, INTERAMERICAN SOURCING CO. INC., CARIBBEAN RETAIL VENTURES INC., GUO SHENG, PESHAN VASTGOEB N.V., YIN RONG TRADING COMPANY N.V., SHAZAM ENTERPRISES & INVESTMENTS LTD., U.S. SHIPPING INC. SD, CHINA CONTAINER LINE LTD (NEW YORK), OCEAN KNIGHT SHIPPING INC., AIT WORLDWIDE LOGISTICS INC., IMPORTADORA BICIMOTO LTDA.C.A., PLASTICOS HERCULES C.A., AUTOMOTRIZ DISTRIBUCION AUTODIST, COMFORT ENGINEERING, ARUBA BLUE VILLAGE, PACIFICO SUPERMARKET, PRIMEX VINYL CONCEPTS INC., BANCO BILBAO VIZCAYA ARGENTARIA PR, PAN AMERICAN ELETRIC DO

BRASIL LTDA RUA, KUN SUN CHANG(CAPITAL FACTORY), CONSOLCARGO LTDA, ARTEX S.A., DEONARINE SUGRIM, AMARNAUTH SOOKRAM, DEONARINE SUGRIM, JAMIL INTERNATIONAL LIMITED, KARST AGENCIES, ELKAY DISTRIBUTORS LTD., PRECISION TRADING CORP., MADERAS ALFA, INC., ROOMS TO GO, INTERNATIONAL TILES CARPETS AND RUGS LTD., AMERICAN ROLAND FOOD CORP., SING DA RESTAURANT, CADEL TRADING, SANTRAX MARKETING LIMITED, EXPEDITORS INTERNATIONAL, USA SHOP C.A., INTERGLOBO NORTH AMERICA INC., CONAIR CORPORATION, L G SOURCING INC., ELECTROLUX HOME PRODUCTS, ELECTROLUX MAJOR APPLIANCES, TRANSMART LOGISTICS INC., ALLIANCE INTERNATIONAL, SAVANT INTERNATIONAL LOGISTICS LTD., SCHENKER INC., ALLIANCE INTERNATIONAL, ELECTROLUX MAJOR APPLIANCES, GLOBE EXPRESS SERVICES, SEARS ROEBUCK AND CO., P.C.P. S.A., GRACEKENNEDY LIMITED, PARSRAM DISCOUNT STORE, BHOJWANI GENERAL IMPORTERS, ELECTRO REFRI S.A/CASAMI, ALI'S HARDWAREMATERIALS&SERVICES LTD., EUROMODA INTERNATIONAL CORP., J. PICA AND CIA. INC., HADCO LTD., RICAL LOGISTICS, AIRGATE INT'L CORP (NEW YORK), UPS SUPPLY CHAIN SOLUTIONS INC., MENLO WORLDWIDE, KAYBEE EXIM PTE LTD., C.K.M.C POR A, GAZEBO (H.K.) LIMITEDAND COMPANIES XYZ 1-30 (altogether, the "Claimants"), alleges upon information and belief, as follows:

INTRODUCTION

1. Plaintiffs bring this lawsuit for declaratory relief against all the shippers, consignees, owners, holders, or assignees of bills of lading relative to cargos stored in hold no.5 of the M/V HAIFA which caught fire at sea as a reason of the ignition of one container ZIMU1037636 containing an undeclared hazardous product. Plaintiffs seek a declaration that

their liability be excluded for all damages resulting from the fire. Plaintiffs seek further a declaration that the persons found to be liable for the fire will hold them harmless and indemnify them of all claims and damages, notably from the Claimants, as a result of a failure to comply with rules and regulations on hazardous and dangerous products.

JURISDICTION AND VENUE

2. This is an admiralty or maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1333 and 28 U.S.C. § 1331.

3. Venue is proper under 28 U.S.C. §§ 1391 (c) and (d), and under section 24 of Zim's Bill of Lading terms and conditions.

PARTIES

4. At and during all times hereinafter mentioned, Plaintiff Zim was and still is a foreign corporation organized and existing under and by virtue of the laws of the State of Israel, with an office and principal place of business located at 9 Andrei Sakharov Street, Matam P.O.B. 1723, Haifa, 31016 Israel. Zim, at all times hereinafter mentioned, was engaged in the business of ocean transportation services.

5. At and during all times hereinafter mentioned, Plaintiff Koron Maritime, Inc. was and still is a foreign corporation organized and existing under and by virtue of the laws of the State of Liberia, with an office and principal place of business located at 80 Broad Street, Monrovia, Liberia, C/O LISCR TRUST COMPANY. Koron, at all times hereinafter mentioned, is the owner of the vessel M/V ZIM HAIFA.